

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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CONTINENTAL INSURANCE COMPANY,

Plaintiff,

CV. ACTION 10-4586 (MLC)

v.

SECURI ENTERPRISES, INC, SCOTT SANDERS,  
MARCIE LYN URY-SANDERS, FRANK COVINO,  
TERRY L. YOUNG, SR., KAMARA STEWART,  
MAURICE PERDOME, KEVIN BROTHERS,  
TASHA RATTRAY, PARIS NIMBHARD,  
DEMETRIUSE FINCHER, JUCLA ADAMS,  
GREGORY TERRY, JOHN and JANE DOES 1-5,  
Fictitious names of persons who conspired to  
conceal true nature of Securi Enterprises, Inc.'s  
business JOHN DOES 6-10, Fictitious names of  
persons who may have claim or claims against  
Securi Enterprises, Inc. arising out of motor vehicle  
Incidents from April 2, 2008 to January 5, 2009,  
JANE DOES 6-10, Fictitious names of persons  
who may have claim or claims against Securi  
Enterprises, Inc. arising out of motor vehicle  
Incidents from April 2, 2008 to January 5, 2009,

**NOTICE OF  
MOTION**

Defendants.  
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PLEASE TAKE NOTICE that, upon the attached affidavit of Jeffrey C. Hoffman  
executed on November 11, 2010, and the exhibits attached thereto, and upon all prior  
proceedings had herein, Defendants Securi Enterprises, Inc., Scott Sanders and Marcie  
Lyn Ury-Sanders will move this Court, on December 6, 2010 at 10:00 a.m., at the  
Courthouse located at 402 East State Street, Room 2020, Trenton, New Jersey, for an  
order (1) staying the above-captioned action pending the outcome of a pending criminal  
investigation in which Mr. Sanders is a target, or, alternatively, (2) staying the  
depositions of Mr. and Mrs. Sanders for six months, with such stay to be revisited at the  
end of that period.

PLEASE TAKE FURTHER NOTICE that pursuant to L.Civ.R.78(1)(a)  
answering papers, if any, are to be served upon the undersigned counsel no later than  
November 22, 2010.

Dated: New York, New York  
November 11, 2010

HOFFMAN & POLLOK LLP

By: William A. Rome  
William A. Rome (9045)

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